

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

3M COMPANY,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 1:11cv627
)	
CHRISTIAN INVESTMENTS LLC,)	
D/B/A PROTECTED DOMAIN)	
SERVICES, et al.,)	
)	
Defendants.)	
_____)	

**DECLARATION OF WENDY C. LARSON IN SUPPORT OF
PLAINTIFF'S NOTICE OF ERRATA**

I, Wendy C. Larson, declare as follows:

1. I am an attorney with Pirkey Barber LLP, 3M's outside counsel in this lawsuit.
2. Attached as **Exhibit A** is a copy of the cease and desist letter addressed to "Arthit" alerting the defendant to 3M's objection to his/her use of ssswin.me.
3. Attached as **Exhibit B** is a copy of the cover letter to "Arthit" transmitting a courtesy copy of the complaint in this lawsuit.
4. Attached as **Exhibit C** are Whois records for domain names owned by MS and Arthit reflecting use of the same email address (sss_callcenter@hotmail.com) in the ownership contact information.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed in Austin, Texas on this 29th day of November, 2011.



Wendy C. Larson

EXHIBIT A



Steven M. Espenshade
(512) 482-5242
sespenshade@pirkeybarber.com

June 8, 2011

VIA EMAIL: SSS_CALLCENTER@HOTMAIL.COM

Arthit
SSS Company
Bangkok
Sa Kaeo
TH 27120

Re: *Violation of the Trademark Rights of 3M Company*
(Our Reference 3MTM:130)

This law firm represents 3M Company ("3M") in trademark and unfair competition matters. We write concerning your use of 3M's mark in connection with your website at www.ssswin.me.

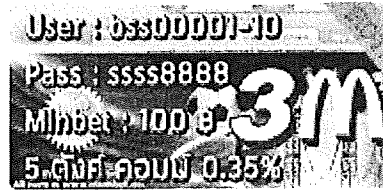
As you undoubtedly know, 3M is one of the world's most well-known and respected companies, offering more than 50,000 products and services under the famous mark and name 3M ("the 3M Mark"). 3M sells and distributes its products and services worldwide through a number of affiliates, including its subsidiary in Thailand named 3M Thailand Ltd. The 3M Mark has been widely used for decades in connection with these products and services, and 3M owns a number of incontestable federal registrations for the 3M Mark. *See, e.g.*, U.S. Reg. Nos. 1,445,795; 1,490,732; and 1,959,110. Further, 3M owns numerous registrations in Thailand for the 3M Mark, among many other jurisdictions. *See, e.g.*, Thailand Reg. Nos. KOR57338; BOR8629; and BOR8244. 3M also maintains an official website at www.3M.com, which makes extensive use of the 3M Mark.

As a result of its long and widespread use and promotion, the public strongly identifies the 3M Mark with 3M and its goods and services. Consequently, 3M enjoys valuable goodwill, as well as strong and enforceable rights, in that mark. Because this goodwill is important to 3M, it cannot permit others to use the 3M Mark in a way that is likely to cause confusion as to any nonexistent sponsorship or affiliation with 3M, or to dilute or tarnish the 3M Mark.

3M is highly concerned that you are prominently using a colorable imitation of its mark in association with the online gambling websites you operate at www.ssswin.me, including as shown below:

June 8, 2011

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Your website also features several links titled "3M" which divert users to third party gambling websites not owned or controlled by 3M. As you target Thai consumers and online gambling is illegal in Thailand, your use is especially troubling.

Your prominent use of the 3M Mark in this manner on your website is highly likely to confuse consumers into believing that your website is in some way affiliated with or approved by 3M. Your use is also likely to dilute the distinctive quality of the famous 3M Mark. Thus, your use violates 3M's trademark rights. *See, e.g.*, 15 U.S.C. §§ 1114(1), 1125(a), and 1125(c).

Accordingly, we demand that you (1) immediately cease all use of the 3M Mark; and (2) agree that in the future you will not use any name or mark confusingly similar to the 3M Mark or any other mark owned by 3M. 3M would prefer to resolve this matter without litigation but is prepared to take whatever steps are necessary to prevent its 3M Mark from being infringed and diluted, particularly in an egregious case such as this.

We ask you to respond as soon as possible giving your assurance that you will promptly comply with the above demands. You may indicate your agreement by returning this letter to us with your signature in the spaces provided below.

Very truly yours,


Steven M. Espenshade

AGREED:

Signature: _____

Name: _____

Title: _____

Date: _____

EXHIBIT B



Wendy C. Larson
(512) 482-5231
wlarson@pirkeybarber.com

June 13, 2011

VIA EMAIL: SSS_CALLCENTER@HOTMAIL.COM

Arthit
SSS Company
Bangkok
Sa Kaeo
TH 27120

Re: *3M Company Lawsuit* (3MTM:130)

Dear Sir or Madam:

As you know, this law firm represents 3M Company ("3M") in trademark and unfair competition matters. We have previously contacted you regarding your role as a domain name registrant, hosting service provider, and/or provider of other services for websites which violate the trademark rights of 3M, and you have either ignored our correspondence or otherwise refused to fully comply with 3M's demands.

The purpose of this letter is to inform you that we have filed a lawsuit in the United States District Court for the Eastern District of Virginia, naming you as a defendant in connection with these activities. A courtesy copy of the complaint is attached. We are in the process of arranging to formally serve the complaint and summons on you. Moreover, we will soon be filing a motion for preliminary injunction, which will be served on you separately.

If you have any questions or would like to discuss resolving this matter, please feel free to call me or respond by email.

Sincerely,

A handwritten signature in cursive script that reads 'Wendy C. Larson'.

Wendy C. Larson

EXHIBIT C

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ssswin.me

Whois Search

Search

[Overview](#) | [Whois Lookup](#) | [Reverse Whois](#) | [Whois History](#) | [Hosting History](#) | [Screenshot History](#) | [Name Server Report](#) | [Reverse IP](#) | [DNS Tools](#)

Whois Record For Ssswin.me

[Acquire this Domain Name](#)

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Search Whois Records

Search

Add Missing Screenshot:

[Queue Screenshot For Addition](#)

You the smart one? Let us show you [the job you dream of](#)

[Whois Record](#) | [Site Profile](#) | [Registration](#) | [Server Stats](#) | [My Whois](#)

Whois Record

Reverse Whois: "sss company" owns about **61 other domains**Email Search: sss_calicenter@hotmail.com is associated with about **30 domains**Whois History: **25 records** have been archived since **2011-04-21**.Reverse IP: **1 other site is** hosted on this server.

Domain Monitor supports .com, .net, .org, .biz, .info, and .us domains



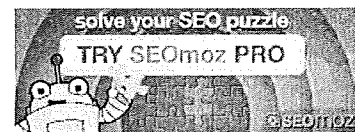
Domain ID:DI749670-ME
 Domain Name:SSSWIN.ME
 Domain Create Date:14-Dec-2010 12:04:04 UTC
 Domain Last Updated Date:28-Oct-2011 02:52:12 UTC
 Domain Expiration Date:14-Dec-2011 12:04:04 UTC
 Last Transferred Date:
 Sponsoring Registrar:Directi Internet Solutions d/b/a PublicDomainRegistry.com R28-ME
 Created by:Directi Internet Solutions d/b/a PublicDomainRegistry.com R28-ME
 Last Updated by Registrar:Directi Internet Solutions d/b/a PublicDomainRegistry.com R28-ME
 Domain Status:CLIENT TRANSFER PROHIBITED
 Registrant ID:DI_9136252
 Registrant Name:Arthit
 Registrant Organization:sss company
 Registrant Address:Bangkok
 Registrant Address2:Bangkok
 Registrant Address3:
 Registrant City:Sa Kaew
 Registrant State/Province:Sa Kaew
 Registrant Country/Economy:TH
 Registrant Postal Code:27120
 Registrant Phone:+66.828898896
 Registrant Phone Ext.:
 Registrant FAX:
 Registrant FAX Ext.:
 Registrant E-mail:sss_calicenter@hotmail.com
 Admin ID:DI_9136252
 Admin Name:Arthit
 Admin Organization:sss company
 Admin Address:Bangkok
 Admin Address2:Bangkok
 Admin Address3:
 Admin City:Sa Kaew
 Admin State/Province:Sa Kaew
 Admin Country/Economy:TH
 Admin Postal Code:27120
 Admin Phone:+66.828898896
 Admin Phone Ext.:
 Admin FAX:
 Admin FAX Ext.:
 Admin E-mail:sss_calicenter@hotmail.com
 Tech ID:DI_9136252
 Tech Name:Arthit
 Tech Organization:sss company
 Tech Address:Bangkok
 Tech Address2:Bangkok
 Tech Address3:
 Tech City:Sa Kaew
 Tech State/Province:Sa Kaew
 Tech Country/Economy:TH
 Tech Postal Code:27120



Country TLDs General TLDs

Available domains for registration:

- | | |
|---------------------------------------|--------------------------|
| <input type="checkbox"/> SsSwIn.at | Register |
| <input type="checkbox"/> SsSwIn.be | Register |
| <input type="checkbox"/> SsSwIn.ch | Register |
| <input type="checkbox"/> SsSwIn.cn | Register |
| <input type="checkbox"/> SsSwIn.co.uk | Register |
| <input type="checkbox"/> SsSwIn.de | Register |
| <input type="checkbox"/> SsSwIn.dk | Register |
| <input type="checkbox"/> SsSwIn.gs | Register |
| <input type="checkbox"/> SsSwIn.gu | Register |
| <input type="checkbox"/> SsSwIn.fr | Register |

[Register All Selected >](#) [Show all \(19\) >](#)


Tech Phone:+66.828898896
Tech Phone Ext.:
Tech FAX:
Tech FAX Ext.:
Tech E-mail: sss_callcenter@hotmail.com
Nameservers:SIANARAN.DYNDNS.ORG
Nameservers:SSSIN88.DYNDNS.ORG
Nameservers:
Nameservers:
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ssswin.com

Whois Search

Search

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Whois Record For Ssswin.com

Acquire this Domain Name

Like 1k

Search Whois Records

Search

[Whois Record](#) | [Site Profile](#) | [Registration](#) | [Server Stats](#) | [My Whois](#)

Whois Record

Email Search: sss_callcenter@hotmail.com is associated with about **30 domains**

Registrar History: **1 registrar**

NS History: **9 changes** on 6 unique name servers over 6 years.

IP History: **8 changes** on 6 unique IP addresses over 2 years.

Whois History: **62 records** have been archived since 2009-08-29.

Reverse IP: **142,807 other sites** hosted on this server.



Monitor This Domain Name



Domain: ssswin.com
Status: Protected

DNS:

ns1157.websitewelcome.com
ns1158.websitewelcome.com

Created: 2009-08-26 00:00:00

Expires: 2012-08-26 00:00:00

Last Modified: 2009-08-26 22:55:02

Registrant Contact:

N/A

M S (sss_callcenter@hotmail.com)

Bangkok

Bangkok, BangKhen, th 10230

P: +66.10230 F:

Administrative Contact:

N/A

M S (sss_callcenter@hotmail.com)

Bangkok

Bangkok, BangKhen, th 10230

P: +66.10230 F:

Technical Contact:

N/A

M S (sss_callcenter@hotmail.com)

Bangkok

Bangkok, BangKhen, th 10230

P: +66.10230 F:

Billing Contact:

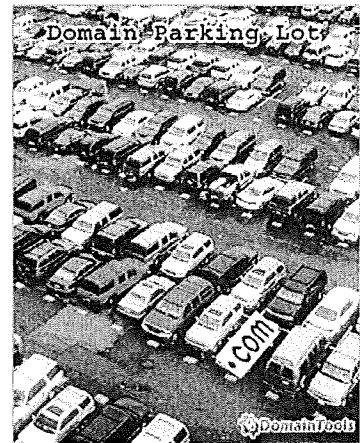
N/A

M S (sss_callcenter@hotmail.com)

Bangkok

Bangkok, BangKhen, th 10230

P: +66.10230 F:



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Country TLDs General TLDs

Available domains for registration:

☐ Ssswin.at [Register](#)

☐ Ssswin.be [Register](#)

☐ Ssswin.ch [Register](#)

☐ Ssswin.cn [Register](#)

☐ Ssswin.co.uk [Register](#)

☐ Ssswin.de [Register](#)

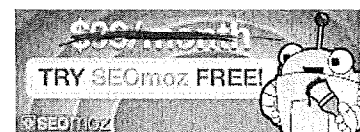
☐ Ssswin.dk [Register](#)

☐ Ssswin.es [Register](#)

☐ Ssswin.eu [Register](#)

☐ Ssswin.fr [Register](#)

[Register All Selected >](#) [Show all \(19\) >](#)



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